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**UNDER SEAL**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3:19-cr-00156-BR**

**v.**

**SUPERSEDING INDICTMENT**

**CATALIN BUNEA;**

**GEORGE NICOLAE ONICESCU; and**

**Defendants.**

**18 U.S.C. § 1349;  
18 U.S.C. § 1029(a)(1);  
18 U.S.C. § 1029(a)(4);  
18 U.S.C. § 1344; and  
18 U.S.C. § 1028A  
18 U.S.C. § 2**

**UNDER SEAL**

**THE GRAND JURY CHARGES:**

**COUNT 1  
(Conspiracy to Commit Bank Fraud)  
(18 U.S.C. § 1349)**

1. Beginning at an unknown time but no later than on or about July 31, 2018, and continuing until at least on or about May 1, 2019, within the District of Oregon and elsewhere, defendants CATALIN BUNEA, [REDACTED], GEORGE NICOLAE ONICESCU, and [REDACTED] along with others known and unknown to the grand jury, did knowingly combine, conspire, confederate, and agree with each other to commit Bank Fraud, to wit, they agreed to knowingly execute and attempt to execute a material

**Superseding Indictment**

scheme and artifice to defraud financial institutions as to a material matter and to obtain money, funds, credits, assets, securities, or other property owned by, or under the custody or control of, financial institutions by means of false or fraudulent pretenses, representations, or promises in violation of 18 U.S.C. § 1344.

#### **MANNER AND MEANS AND SCHEME TO DEFRAUD**

2. Defendants and their co-conspirators used the following manner and means to carry out the conspiracy and scheme to defraud:

3. It was part of the conspiracy and scheme to defraud that defendants and their co-conspirators arranged travel for various co-conspirators to enter the United States by illegally crossing the borders of the United States or by submitting false applications for visas to enter the United States.

4. It was part of the conspiracy and scheme to defraud that defendants and their co-conspirators installed “skimmer” devices into ATM/Credit Card reading machines in order to steal account information, including financial account numbers and PIN numbers, from victims who used the machines.

5. It was part of the conspiracy and scheme to defraud that defendants and their co-conspirators stole account information of customers at various financial institutions as defined in 18 U.S.C. § 20.

6. It was part of the conspiracy and scheme to defraud that defendants and their co-conspirators shared the stolen account information by sending it to each other to perpetuate the fraud.

7. It was part of the conspiracy and scheme to defraud that defendants and their co-conspirators coded the stolen account information onto access devices in order to make counterfeit access devices.

8. It was part of the conspiracy and scheme to defraud that defendants and their co-conspirators used the counterfeit access devices with the stolen account information to make purchases at various retailers.

9. It was part of the conspiracy and scheme to defraud that defendants and their co-conspirators used the counterfeit access devices with the stolen account information at ATMs to withdraw cash from victims' financial accounts at various financial institutions as defined in 18 U.S.C. § 20.

All in violation of 18 U.S.C. § 1349.

**COUNT 2**  
**(Counterfeit Access Device Fraud)**  
**(18 U.S.C. §§ 1029(a)(1), (c)(1)(a)(i))**

1. All prior paragraphs of this Superseding Indictment are incorporated herein.

2. On or about March 18, 2019, in the District of Oregon and elsewhere, defendants, CATALIN BUNEA, [REDACTED] GEORGE NICOLAE ONICESCU, and [REDACTED] knowingly and with intent to defraud, produced, used, and trafficked in one or more counterfeit access devices, and the production, trafficking, and said use affected interstate and foreign commerce in that it involved transactions with businesses involved in such commerce as well as transmissions and transportation over state and international borders;

All in violation of 18 U.S.C. §§ 1029(a)(1), (c)(1)(a)(i) and 2.



**COUNT 3**  
**(Illegal Possession of Device-Making Equipment)**  
**(18 U.S.C. §§ 1029(a)(4), (c)(1)(a)(ii))**

1. All prior paragraphs of this Superseding Indictment are incorporated herein.
2. On or about April 9, 2019, in the District of Oregon and elsewhere, defendants

CATALIN BUNEA, [REDACTED] GEORGE NICOLAE ONICESCU, and [REDACTED] knowingly and with intent to defraud, possessed device-making equipment, and said possession affected interstate and foreign commerce in that the possession involved the use of businesses involved in such commerce as well as transmissions and transportation over state and international borders;

All in violation of 18 U.S.C. §§ 1029(a)(4), (c)(1)(a)(ii) and 2.

**COUNTS 4-8**  
**(BANK FRAUD)**  
**(18 U.S.C. §§ 1344, 2)**

1. All prior paragraphs of this Superseding Indictment are incorporated herein.
2. At all times relevant to this Superseding Indictment, the financial institutions listed in the counts set forth below were financial institutions as defined in 18 U.S.C. § 20.
3. On or about the dates set forth below in each Count, in the District of Oregon and elsewhere, the defendants and others, for purposes of executing and attempting to execute the above-described material scheme and artifice to defraud financial institutions as to a material matter and for obtaining money, funds, or property owned or under control of the named financial institutions by means of materially false or fraudulent pretenses, representations, or promises knowingly used stolen account information to steal money from victims' accounts held at financial institutions as set forth below:

Count	Defendant(s)	Transaction Date	Financial Institution Account Accessed	Type of Transaction
4	CATALIN BUNEA	3/18/2019	Financial Account Number Belonging to ADULT VICTIM 1 (IQ Credit Union)	ATM
5	[REDACTED]	3/20/2019	Financial Account Number Belonging to ADULT VICTIM 2 (IQ Credit Union)	ATM
6	[REDACTED]	3/20/2019	Financial Account Number Belonging to ADULT VICTIM 3 (IQ Credit Union)	ATM
7	GEORGE NICOLAE ONICESCU	3/18/2019	Financial Account Belonging to ADULT VICTIM 4 (Great NW Credit Union)	Purchase at Best Buy in Portland, OR
8	GEORGE NICOLAE ONICESCU	3/20/2019	Financial Account Belonging to ADULT VICTIM 5 (Great NW Credit Union)	ATM

All in violation of 18 U.S.C. §§ 1344 and 2.

**COUNTS 9-13**  
**(AGGRAVATED IDENTITY THEFT)**  
**(18 U.S.C. §§ 1028A, 2)**

1. All prior paragraphs of this Superseding Indictment are incorporated herein.
2. On or about the dates set forth below in each Count, in the District of Oregon and elsewhere, the defendants and others, known and unknown to the Grand Jury did unlawfully, knowingly, and intentionally transfer, possess, and use, without lawful authority, a means of identification of another, knowing that the means of identification belonged to a real person, during and in relation to felony violations of provisions contained in Chapters 47 and 63 of Title 18, to wit: Access Device Fraud, Bank Fraud, and Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C. §§ 1029; 1344 and 1349.



Count	Defendant(s)	Transaction Date	Means of Identifications	Felony Violation
9	CATALIN BUNEA	3/18/2019	Financial Account Number Belonging to ADULT VICTIM 1 (IQ Credit Union)	18 U.S.C. § 1349 (Count 1); 18 U.S.C. § 1029(a)(1) (Count 2); 18 U.S.C. § 1029(a)(4) (Count 3); 18 U.S.C. § 1344 (Count 4)
10	[REDACTED]	3/20/2019	Financial Account Number Belonging to ADULT VICTIM 2 (IQ Credit Union)	18 U.S.C. § 1349 (Count 1); 18 U.S.C. § 1029(a)(1) (Count 2); 18 U.S.C. § 1029(a)(4) (Count 3); 18 U.S.C. § 1344 (Count 5)
11	[REDACTED]	3/20/2019	Financial Account Number Belonging to ADULT VICTIM 3 (IQ Credit Union)	18 U.S.C. § 1349 (Count 1); 18 U.S.C. § 1029(a)(1) (Count 2); 18 U.S.C. § 1029(a)(4) (Count 3); 18 U.S.C. § 1344 (Count 6)
12	GEORGE NICOLAE ONICESCU	3/18/2019	Financial Account Number Belonging to ADULT VICTIM 4 (Best Buy - Portland)	18 U.S.C. § 1349 (Count 1); 18 U.S.C. § 1029(a)(1) (Count 2); 18 U.S.C. § 1029(a)(4) (Count 3); 18 U.S.C. § 1344 (Count 7)
13	GEORGE NICOLAE ONICESCU	3/20/2019	Financial Account Number Belonging to ADULT VICTIM 5 (IQ Credit Union)	18 U.S.C. § 1349 (Count 1); 18 U.S.C. § 1029(a)(1) (Count 2); 18 U.S.C. § 1029(a)(4) (Count 3); 18 U.S.C. § 1344 (Count 8)

All in violation of 18 U.S.C. §§ 1028A and 2.

#### **FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in Counts 1 through 8 of this Indictment, defendants shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(2)(A), as well as

1029(c)(1)(C) as applicable for Counts 2 and 3, any property constituting, and derived from, proceeds defendants obtained directly and indirectly, as the result of such violation.

**SUBSTITUTE ASSETS**


If any of the above-described forfeitable property listed in Counts 1 to 8 of this Superseding Indictment, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described in these forfeiture allegations.

Dated: July 23, 2019

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

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